

III. REMARKS

1. Claims 28 and 29 are new.

2. Claims 1-7, 9-16 and 18-27 are not unpatentable over WO 98/20663 to Toyryla et al. ("Toyryla") in view of WO 99/25102 to Eriksen et al. ("Eriksen") under 345 U.S.C. §103(a).

The present invention is aimed to establishing a telecommunication link between a calling terminal and a called terminal, wherein the terminals are in different telecommunications networks. These networks are interconnected using a gateway, wherein the telecommunication link is established via the gateway after the user has dialled the target telephone number associated with the target terminal. The problem that the invention solves is connecting terminals in different telecommunications networks that are interconnected with different gateways.

When the user is establishing a telecommunications link, the used gateway depends on the type of the telecommunications network, in which the target terminal is operable. The main idea of the invention is to provide the calling terminal with information of the target telephone number together with call type and the gateway associated with the call type. This information is used for routing the call request to the correct gateway, and this is done automatically without any actions from the user.

Toyryla teaches a method for establishing a telecommunication connection between subscriber stations of first and the second telecommunication systems. Essential for the method of Toyryla is that in the calling subscriber stations a memory table is

maintained, wherein a part of the number that can be dialled by the subscriber station corresponds to the gateway number.

In Toyryla, when the connection is established, the gateway number is used in the call set-up message from the calling subscriber station to the mobile communications system, which is in response for call establishment. However, it is not always useful to store only the gateway number as there may be more than one gateway that can be used for routing the specified telecommunication connection.

In Applicant's invention, the call type identifies gateways for routing the call. The features of Toyryla do not disclose or suggest Applicant's invention.

Eriksen does not overcome the deficiencies of Toyryla. Eriksen does not disclose or suggest associating a target telephone number with a call type as is claimed by Applicant. In Eriksen, the user adds a "prefix" to the called number to identify the gateway. (page 3, lines 5-11). The user adds the code in front of the called number that identifies the "type of gateway" best suited to handle the call. (page 4, lines 10-14). Eriksen merely allows the user to manually identify the gateway to route the call. (page 5, lines 7-9). Nothing in Eriksen relates to "associating the target telephone number with a call type" as is claimed by Applicant. In Applicant's invention, the target telephone number is associated with a "call type." A "gateway address" can then be extracted that is related to the associated call type. (page 7, lines 4-7).

Thus, Eriksen does not cure the deficiencies outlined above with respect to Toyryla, and the combination of the two references cannot disclose or suggest Applicant's invention. Although

Eriksen teaches associating the target telephone number with the type of gateway to route the calls to the correct type of gateway, it gives no hint to the skilled man in the art to solve the problems relating to interconnecting one terminal to another terminal in different types of networks with an appropriate gateway as described in the present invention. Eriksen teaches selecting a suitable gateway by using the specific characters that are added to the target telephone number. Toyryla system dials a number corresponding to a gateway number that can be used for interconnecting two networks. This does not address the situation where there may be more than one usable gateway and addresses may change. The gateway is fixed to the number, not a call type. It is cumbersome to track all the changes relating to telephone numbers and their respective gateways in all subscriber terminals. When there is only the type of call and gateway pairs, the amount of updated number pairs or information decreases significantly.

Both Toyryla and Eriksen teach either analyzing the dialled telephone number to make a connection to a certain gateway to be used or adding a distinctive prefix to indicate the same. This is not the same as determining a gateway based on a call type. In Toyryla, the dialled number corresponds to the gateway number. (Abstract). This is clearly indicated, e.g. by Figure 1a of Toyryla where one can see that the gateway number attached to a number is a multi-digit number sequence which no-one wants to learn by heart. Toyryla teaches storing the gateway number in the memory, but a problem still remains when the calling a telephone number does not exist in the memory. In that case the user of the telephone station would still need to either know a suitable gateway number or recognize the suitable gateway number from a list of the stored gateway numbers. Eriksen on the other

hand, teaches a two-digit prefix to be added in front of the dialled telephone number "to tell" the gatekeeper which gateway to route the communication to. Neither relates a call type to a gateway, as in Applicant's invention. Thus, the combination of Toyryla and Eriksen cannot disclose or suggest Applicant's invention. At most, all the combination of the two references suggests is that the user can manually enter the desired gateway by adding a prefix to the dialled number. This is not Applicant's invention. Thus, claims 1, 14, 22 and 26 are not unpatentable over Toyryla and Eriksen. Claims 2-7, 9-13, 15, 16, 18-21, 23-25 and 27 should be allowable at least by reason of their respective dependencies.

2. Claims 8 and 17 are not unpatentable over Toyryla in view of Eriksen and further in view of Doviak et al. ("Doviak") (U.S. Patent No. 6,418,326) under 35 U.S.C. §103(a).

Claims 8 and 17 should be allowable at least by reason of their respective dependencies, as noted above.

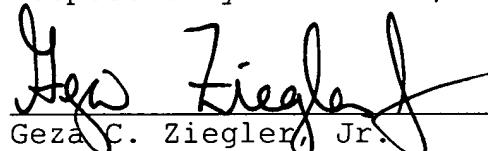
Also, there is no motivation to combine Toyryla and Eriksen with Doviak to achieve Applicant's invention for purposes of 35 U.S.C. §103(a). Toyryla relates to establishing a telecommunication connection between subscriber stations of first and second telecommunication systems. Eriksen is a way to "manually" route calls from one network to an external network. Doviak on the other hand is for transparent communication between a mobile device and a fixed host network. There is simply no reason that one of skill in the art would move from Toyryla and Eriksen to Doviak. Perhaps one might see some applicability of Doviak with hindsight knowledge of Applicant's invention, but this would of course be impermissible.

Thus, claims 8 and 17 should be allowable.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

A check for \$36.00 is enclosed for the additional claims fee. The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,


Geza C. Ziegler, Jr.
Reg. No. 44,004

14 June 2004
Date

Perman & Green, LLP
425 Post Road
Fairfield, CT 06824
(203) 259-1800 Ext. 134
Customer No.: 2512

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service on the date indicated below as first class mail in an envelope addressed to Mail Stop Amendment, Commissioner of Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

Date: 14 June 2004

Signature: Laura Perregue
Person Making Deposit